

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

2015 AUG 10 PM 2:17

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION

CLERK'S OFFICE  
AT BALTIMORE  
BY KR DEPUTY

UNITED STATES OF AMERICA

v.

JOHN ADAMS,

Defendant.

WILLIAM C. BOND,

Movant-Intervenor *pro se*.

\*

\*

Criminal Action No.: 11-00547-RDB-11

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

**MOTION TO INTERVENE, TO CORRECT AND/OR UNSEAL THE DOCKET, AND  
TO MAKE THE 'ATTORNEY CONFLICTS OF INTEREST' HEARING PUBLIC WITH  
EXPEDITION REQUEST**

Comes now Movant-Intervenor *pro se*, William C. Bond, under the First Amendment and common law, and states:

**INTRODUCTION**

1. Movant is a member of the public who also is the owner of "Baltimore Corruption Wire," a Maryland public policy initiative with many followers.

2. This case has attracted widespread media attention for some time, both locally and nationally,

including numerous articles by The Baltimore Sun.<sup>1</sup>

### **THE STILL SEALED DOCKET SHEET & RECORD**

3. On June 1, 2015, the U.S. Court of Appeals for the Fourth Circuit entered a ‘Sealed’ Published Opinion in this case which was explained by a Published & Redacted ‘Sealing Order.’<sup>2</sup>

4. In this ‘Sealing Order,’ the Fourth Circuit explained that the district court judgment has been vacated and remanded, that the district court is to analyze the unsealing of the docket sheet and the record under named precedents, and that, in the opinion of the Fourth Circuit, the government has acted in ‘bad faith’ in this matter if not having actually committed ‘prosecutorial misconduct.’<sup>3</sup>

5. So far, from what can be gleaned from the present docket in this case, neither the district court, nor the parties, has acted in any way upon the Fourth Circuit’s vacation and remand judgment.

### **THE ATTORNEY ‘CONFLICTS OF INTEREST’ MATTER**

6. On July 30, 2015, this court docketed defendant Adams’ letter to the court regarding his displeasure with his counsel.

---

<sup>1</sup> For example, please see: [http://articles.baltimoresun.com/2013-02-26/news/bal-dead-man-inc-leader-gets-life-sentence-in-texas-court-20130226\\_1\\_safety-and-addictions-perry-roark-criminal-brotherhood](http://articles.baltimoresun.com/2013-02-26/news/bal-dead-man-inc-leader-gets-life-sentence-in-texas-court-20130226_1_safety-and-addictions-perry-roark-criminal-brotherhood)

<sup>2</sup> Please see: Docket nos. 804 & 805. Please also see the CA 4 website at: <http://www.ca4.uscourts.gov/Opinions/Published/134360R1.P.pdf>

<sup>3</sup> This ‘Sealing Order’ has been much discussed in legal circles, including on the “Above the Law” website: <http://abovethelaw.com/2015/06/judges-call-out-prosecutors-for-overreach->

7. Of note, within this letter is a statement that the defendant believes he is being resentenced on August 24, 2015, even though the public docket appears to show no evidence of that fact.<sup>4</sup>

8. While, no doubt, convicted felons abuse the post judgment system in many ways, it is hard to argue with this defendant's request that entered counsel contact him about his appellate victory and his case's next steps, if they have not already done so.

9. Further, should defendant Adams' complaint(s) against counsel be proven true, such conduct would be a seeming violation of the Maryland Lawyers' Rules of Professional Conduct, which are adopted by this court, and should also invite scrutiny under Local Rule 705(1)(a).

10. Further, this member of the public finds it troubling that defendant Adams appears not to know his own case number, or that the docket shows not one, but two attorneys of record.

### **RELIEF REQUESTED**

11. Movant requests the court to produce an order complying with the remand instructions of the Fourth Circuit regarding the incomplete and/or still sealed docket sheet and record.

12. Movant requests that any attorney 'conflicts of interest' hearing regarding defendant Adams'

---

call-out-third-judge-for-suggesting-courts-shouldnt-challenge-government/

<sup>4</sup> This fact alone, if proven true, is in direct conflict with the Fourth Circuit's remand of this case.

public complaints regarding his present counsel be conducted in open court with advance notice to the public.

13. Likewise, should the court entertain to conduct any future court filings or hearings under seal, this movant requests advance notice upon the docket of the court's intentions.

### **EXPEDITION**

14. Constitutional First Amendment actions are expedited as a matter of course in this circuit. Movant requests that this court expedite this matter on a 'fast track.'

15. This request also gains extraordinary urgency because the Fourth Circuit ended their 'Sealing Order,' which explained why their 'Published Opinion' was being filed under seal, with the following command:

“Accordingly, the parties — particularly the government — should notify the district court and this Court if sealing of the record (in whole or in part) is no longer necessary.”<sup>5</sup>

16. Clearly, the Fourth Circuit is asking the district court to resolve its sealed record so that the Fourth Circuit may then unseal its own Published Opinion, an opinion which clearly the public should have access to, as it clearly makes damning allegations against the government's conduct


---

<sup>5</sup> Please see: CA 4 case no. 13-4360, Sealed Published Opinion, Redacted Sealing Order, page 3.

in this very case.<sup>6</sup>

WHEREFORE, for the aforementioned reasons, movant prays the court grants the requested relief expeditiously.

Respectfully submitted,

  
\_\_\_\_\_  
WILLIAM C. BOND  
*Pro Se*  
P.O. Box 4823  
Baltimore, Maryland 21211  
(443) 970-2887  
proselitigator@aol.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10th day of August 2015, copies of Movant's **MOTION TO INTERVENE, TO CORRECT AND/OR UNSEAL THE DOCKET, AND TO MAKE THE 'ATTORNEY CONFLICTS OF INTEREST' HEARING PUBLIC WITH EXPEDITION REQUEST** were served by U.S. Mail, postage prepaid, and/or by Email to: **ROBERT R. HARDING**, Office of the U.S. Attorney, 36 S. Charles St., 4<sup>th</sup> Fl., Baltimore, Maryland 21201, Email: robert.harding@usdoj.gov; and to: **PAT M. WOODWARD**, Pat M. Woodward, Esq., Counselor At Law, 1783 Forest Drive, Suite 330, Annapolis, Maryland 21401, Email: pwoodward@woodwardlawgroup.com; and to: **PAUL D. HAZLEHURST**, Office of the Federal Public Defender, 100 S. Charles St., Tower II, Ninth Floor, Baltimore, Maryland 21201, Email: paul\_hazlehurst@fd.org; and to: **JOHN HENRY ADAMS**, Defendant *pro se*, CDF # 2626053, 401 East Madison Street, Baltimore, Maryland 21202.

  
\_\_\_\_\_  
WILLIAM C. BOND

<sup>6</sup> The Fourth Circuit opinion was issued over two months ago. This court must immediately, if they cannot summarily resolve the sealing/closure issues, inform the public of their intentions by either public hearing, a status order, or by a docket notice.